217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

NB/Microseal, Zion Plant Attn: Charles Gremke 2000 Lewis Avenue Zion, Illinois 60099

Applicant's Designation: Date Received: April 28, 2005

Subject: Gravure Printing Lines

Date Issued: August 22, 2005 Expiration Date: August 22, 2010

Location: 2000 Lewis Avenue, Zion

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of eight Rotogravure printing presses (E-1, E-2, E-3, E-4, E-5, N-6, N-7, and N-8) as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/year for volatile organic material (VOM), 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for totaled HAP). As a result, the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2. This permit is issued based upon the plant being exempt from the limitations of 35 Ill. Adm. Code Subpart H: "Flexographic and Rotogravure Printing". This is a consequence of the federally enforceable production and operating limitations restricting potential to emit of VOM to less than applicability threshold level of 25 tons per year from the subject sources.
- 3. VOM emissions from the facility operations shall not exceed 2.71 tons/month and 23.93 tons/year.

VOM emissions shall be calculated using the following equation:

$$E = \sum M_i \times V_i$$

where:

- E VOM emissions (Tons);
- M_i VOM-containing raw materials usage (Tons);
- V_i VOM content of raw materials (fraction).

These limits are based on the maximum production capacity and VOM content of raw materials. Compliance with annual limits shall be determined from running total of 12 months of data.

- 4. The emissions of HAPs as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Illinois EPA.
- 5. The Permittee shall maintain monthly records of the following items:
 - a. The name, identification number and amount (gallons/month and gallons/year) of VOM-containing materials used;
 - b. VOM and HAP content of all VOM/HAP-containing material (lb/gallon); and
 - c. VOM and HAP emissions with supporting calculations (tons/month and tons/year).
- 6. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA and USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to the Illinois EPA or USEPA request for records during the course of a source inspection.
- 7. If there is an exceedance of the requirements of this permit, as determined by the record required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released, a copy of the relevant records, and a description of the exceedance or violation, and efforts to reduce emissions and future occurrences.
- 8. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency Division of Air Pollution Control Compliance Section (#40) P.O. Box 19276 Springfield, Illinois 62794-9276

 $\underline{\text{and}}$ one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency Division of Air Pollution Control - Regional Office 9511 West Harrison Des Plaines, Illinois 60016

If you have any questions on this, please call Valeriy Brodsky at 217/782-2113.

Donald E. Sutton, P.E. Manager, Permit Section Division of Air Pollution Control

DES:VJB:psj

cc. Illinois EPA, FOS Region 1 Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emission from the Printing Facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions from subject emission units are below the levels, e.g., 25 tons per year of VOM, 10 tons/year for a single HAP and 25 tons/year for totaled HAP, at which these units would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from these units will be less than predicted in this summary to the extent that material is handled, and control measures are more effective than required in this permit.

	Emissions (Tons/Year)		
Process	<u>VOM</u>	Single HAP	Total HAPs
	23.93	< 10	< 25

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